**NORTH CAROLINA DIVISION OF AIR QUALITY**

# Application Review

**Issue Date: October ##, 2020**

**Region:** Fayetteville Regional Office
**County:** Robeson
**NC Facility ID:** 7800159
**Inspector's Name:** Evangelyn Lowery-Jacobs
**Date of Last Inspection:** 06/11/2020
**Compliance Code:** 3 / Compliance - inspection

## Facility Data

**Applicant (Facility's Name):** Campbell Soup Supply Company

**Facility Address:**
Campbell Soup Supply Company
2120 Highway 71 North
Maxton, NC 28364

**SIC:** 2032 / Canned Specialties
**NAICS:** 311422 / Specialty Canning

**Facility Classification: Before:** Title V **After:** Title V
**Fee Classification: Before:** Title V **After:** Title V

## Permit Applicability (this application only)

**SIP:** 15A NCAC 02D .0503, 02D .0516, 02D .0521, 02D .0524
15A NCAC 02Q .0508(g)
**NSPS:** NSPS Db
**NESHAP:** 40 CFR 63 Subpart JJJJJJ Updated
**PSD:** NA
**PSD Avoidance:** 02Q .0317 of 02D .0530
**NC Toxics:** NA
**112(r):** Updated
**Other:** NA

## Contact Data

| Facility Contact | Authorized Contact | Technical Contact |
|---|---|---|
| Keith Osterman<br>Environmental Leader<br>(910) 844-1202<br>2120 Highway 71 North<br>Maxton, NC 28364 | Brett Dunson<br>Senior Director of Ops - Maxton<br>(910) 844-1574<br>2120 Highway 71 North<br>Maxton, NC 28364 | Keith Osterman<br>Environmental Leader<br>(910) 844-1202<br>2120 Highway 71 North<br>Maxton, NC 28364 |

## Application Data

**Application Number:** 7800159.20A
**Date Received:** 06/30/2020
**Application Type:** Modification
**Application Schedule:** TV-Sign-501(b)(2) Part II

**Existing Permit Data**
**Existing Permit Number:** 04090/T30
**Existing Permit Issue Date:** 12/07/2018
**Existing Permit Expiration Date:** 10/31/2023

**Total Actual emissions in TONS/YEAR:**

| CY | SO2 | NOX | VOC | CO | PM10 | Total HAP | Largest HAP |
|---|---|---|---|---|---|---|---|
| 2018 | 8.82 | 54.90 | 2.13 | 32.33 | 0.3700 | 0.7244 | 0.6890 [Hexane, n-] |
| 2017 | 7.39 | 56.69 | 2.93 | 33.52 | 0.3200 | 0.7515 | 0.7156 [Hexane, n-] |
| 2016 | 1.32 | 90.74 | 4.19 | 54.23 | 0.3900 | 1.21 | 1.16 [Hexane, n-] |
| 2015 | 30.89 | 60.97 | 23.22 | 33.79 | 3.60 | 0.7598 | 0.7125 [Hexane, n-] |
| 2014 | 20.97 | 50.56 | 19.97 | 29.05 | 3.09 | 0.6481 | 0.6150 [Hexane, n-] |

**Review Engineer:** Richard Simpson

**Review Engineer's Signature:** *Richard Simpson* **Date:** *October ##, 2020*

**Comments / Recommendations:**
**Issue** 04090/T31
**Permit Issue Date:** October ##, 2020
**Permit Expiration Date:** October 31, 2023

## I. Introduction and Purpose of Application

A. Campbell Soup Supply Company (referred to as Campbell Soup throughout this document) currently holds Air Permit No. 04090T30 with an expiration date of October 31, 2023 for a soup manufacturing facility in Maxton, Robeson County, North Carolina. The facility's operation produces various soups and broth. Raw ingredients(meat, vegetables, oysters, flour, sugar, wine, tomato paste, etc.) are brought to the facility either loose or in bulk (stored in bulk silos), or in bulk containers ( super sacks, boxes, drums). Ingredients are blended together where the mixed product is pumped into various sizes of metal or plastic cans. The sealed containers are unsealed and the uncooked products are sent through cookers. The cans are then labeled, packaged, and palletized for shipment. This facility is the largest soup cooking facility in the United States. At full production, the facility produces approximately seven million cans of soup per day. The facility utilizes anhydrous ammonia as refrigerant in their freezer operations, and uses anhydrous ammonia to cool ethylene glycol coolants, which are used in their cooling operations throughout the facility.

B. Permit application No. 7800159.20A was received on June 30, 2020 for a second step modification per NCAC 02Q .0501(b)(2). The first step modification was submitted on May 25, 2017 for boiler replacement and boiler fuel usage updates and that permit (04090T28) was issued on November 27, 2017. Boiler No. 7 commenced operation on July 15, 2019 and the facility was required to send a second step Title V application within 12 months of operation. This permit action will address the following main changes associated with the first and second step modifications as outlined in the application:

- Replace Boiler No. 5 (ID No. ES-021) with Boiler No. 7 (ID No. ES-25). Boiler No. 5 is a 127 million Btu per hour unit that uses natural gas as its primary fuel. No. 2 and No. 6 fuel oils are used as backup. The new boiler is rated at 182 million Btu per hour maximum heat input and will be a gas fired-boiler that uses No.2 fuel oil only during periods of gas curtailment.
- Boiler No. 4 (ID No. ES-020) will no longer fire No. 6 and uses No. 2 fuel oil only during periods of gas curtailment.
- Boiler No. 6 (ID No. ES-22) will only fire natural gas.
- Update and/or remove PSD avoidance for boilers due to elimination of No 6 fuel oil, No. 2 limit on hours, and No. 2 curtailment.

## II. History/Background/Application Chronology

**May 25, 2017** – Permit application 7800159.17C was received as a Part I of the NCAC 02Q .0501(b)(2) Title V modification.

**November 27, 2017** – Permit 04090T28 was signed and issued.

**November 2, 2018** – Permit 04090T29 was signed and issued for a Title V renewal.

**December 2, 2018** – Permit 04090T30 was signed and issued for an administrative amendment.

**January 15, 2020** - The facility was inspected by Evangelyn Lowery-Jacobs from the Fayetteville Regional Office. At the time of the inspection, the facility appeared to operate in compliance with all applicable regulations.

**June 30, 2020** – Permit application 7800159.20A was received as a Part II of the NCAC 02Q .0501(b)(2) Title V modification.

**July 9, 2020 –** Permit engineer Richard Simpson requested the facility to send an updated A form. The form was received from the facility the same day.

**August 11 – 25, 2020** – The facility, Fayetteville Regional Office, and Stationary Compliance Section were requested by the Permitting Section to comment on the modification. Comments were received and included in the permit and review from DAQ.

**August ##, 2020** – Title V Equipment Editor (TVEE) changes were approved by Ms. Jenny Sheppard TVEE Coordinator.

**August ##, 2020** – DRAFT permit sent to public notice and EPA for review prior to issuance. The 30-day public comment period ended **September ##, 2020** with the receipt of no comments. The 45-day EPA review period ended **October ##, 2020** with the receipt of no comments.

**October ##, 2020** – Permit 04090T31 was signed and issued.

## III. Permit Renewal/Modification/Changes

The following table lists all changes made from previous permit 04090T30:

| Page(s) | Section | Description of Change(s) |
|---|---|---|
| Cover and throughout | Throughout | Updated all tables, dates, and permit revision numbers. |
| Attachment | Insignificant Activities | Deleted ID No. IES-1 emergency generator since it has been removed from the facility. |
| Attachment | Insignificant Activities | Added ID No. IES-2 natural gas/propane-fired emergency generator rated at 60 hp or 45kW. |
| Attachment | Insignificant Activities | Deleted ID No. IES-12.1 through 12.10, ten hot water cookers, since they emit only steam. |
| Attachment | Insignificant Activities | Two labeling systems (ID Nos. ES-024A and ES-024B) were reclassified and moved to the insignificant activities list based on historical emissions data. The new ID Nos. are IES-024A and IES-024B |
| 3, 4, 15 | Section 1, Section 2.1, Section 2.2 B.1 | Deleted No. 6 fuel oil limits, monitoring and record keeping since the facility will no longer use it. |
| 3, 6, 15 | Section 1, Section 2.1 B, Section 2.2 B.1. | Deleted Boiler No. 5 ID No. ES-021 as it was replaced with Boiler No. 7 ID No. ES-025. |
| 3, 6, 15 | Section 1, Section 2.1 B, Section 2.2 B.1 | For Boiler No. 6, ID No. ES-022, removed No.2 and No. 6 fuel oil limits, monitoring and record keeping since Boiler No. 6 will only utilize natural gas. Updated 15A NCAC 02D .0503 and .0516. |
| 6 | Section 2.1 B. | Deleted PSD avoidance conditions for SO2 and NOx. Deleting No. 5 boiler and having No. 6 utilize only natural gas makes potential emissions well below the thresholds. |
| 9 | Section 2.1 C.4.e. | Updated NSPS Db subsequent testing requirements for Method 9. |
| 12 | Section 2.1 C.7 | Deleted rule 15 A NCAC .02Q .0504 since facility met the rule with this Step II modification application. |

| Page(s) | Section | Description of Change(s) |
|---|---|---|
| 3, 14 | Section 1, Section 2.1 A.E. | Deleted ID No. ES-TEMPBOIL, as the 86 million BTU/hr boiler will not be utilized at the facility. |
| 15 | Section 2.2 A.1. | Updated reporting and recordkeeping requirements for 15A NCAC 02Q .0508(g) and Section 112(r). |
| 16 | Section 2.2 B.1. | Updated compliance dates, requirements, and reporting for 40 CFR 63 Subpart JJJJJJ. |
| 17-27 | General Conditions | The General Conditions were updated to the latest version of DAQ shell version 5.5 dated 08/25/2020. |

There were changes made to the Title V Equipment Editor (TVEE) under this permit modification.

**IV. Regulatory Review/Equipment Changes/Process Changes**

Campbell is subject to the following regulations, in addition to the requirements in the General Conditions:

a. 15A NCAC 02D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"
b. 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
c. 15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"
d. 15A NCAC 02D .0521 "Control of Visible Emissions"
e. 15A NCAC 02D .0524 "New Source Performance Standards" (40 CFR Part 60 Subparts Db)
f. 15A NCAC 02D .0524 "New Source Performance Standards" (40 CFR Part 60 Subparts JJJJ)
g. 15A NCAC 02D .1111 "Maximum Achievable Control Technology"
h. (40 CFR Part 63 Subpart JJJJ)
i. 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (40 CFR Part 63 Subpart JJJJJJ)
j. 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"
k. 15A NCAC 02Q .0317 "Avoidance Conditions" (PSD Avoidance for NOx)
l. 15A NCAC 02Q .0508(g) "Prevention of Accidental Releases – Section 112(r) of the Clean Air Act"

An extensive review for each applicable regulation is not included in this document, as the facility's status with respect to all but one of the regulations has not changed.

Compliance with these regulations will be determined during subsequent inspections, reviews of reports, and stack testing. The 15A NCAC 02Q .0504 Option for Obtaining Construction and Operation Permit is no longer applicable since this application meets the requirements. For a discussion of MACT, CAM, and 112(r) requirements, see Section 6. The permit will be updated to reflect the most current stipulations for all applicable regulations. Updates and details to the permit are noted in the Table of Changes above.

Below is the equipment change permit review from the Permit 04090T28 review for the Step 1 significant modification.

<u>The new emission source that was added:</u>
One natural gas/No.2 fuel oil-fired boiler No. 7 equipped with Low-NOx burners when firing natural gas (182 million Btu per hour maximum heat input capacity)
This boiler is subject to the following regulations:

- 15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers:

The allowable emission rate for this boiler is calculated as follow:
182 million Btu per hour * 0.18 pounds /million Btu = 32.76 pounds per hour
According to the application, potential PM emissions for No.2 fuel oil is 2.99 pounds per hour. Therefore, compliance is expected. No monitoring, recordkeeping or reporting are required.

- 15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources:
  The boiler is equipped to burn both natural gas and No.2 fuel oil. The boiler is not subject to the SO2 standards per §60.42b(k)(2), therefore 02D .0516 is applicable to the boiler. Because the facility is using natural gas and ULSD only, compliance is expected. No monitoring, recordkeeping or reporting are required.
- 15A NCAC 02D .0521, Control of Visible Emissions:
  The boiler is subject to 15A NCAC 02D .1111 for opacity limitations only when No. 2 fuel oil is burned. Therefore, the 02D .0521 opacity standards are still applicable when the boiler fires natural gas. No monitoring, recordkeeping or reporting are required.
- 15A NCAC 02D .0524, New Source Performance Standards (40 CFR 60, Subpart Db)
  See Section V for review.
- 15A NCAC 02Q .0317, Avoidance Conditions (for 15A NCAC 02D .0530, Prevention of Significant Deterioration)
  See Section V for review.
- 15A NCAC 02Q .0317, Avoidance Conditions (for 15A NCAC 02D .1111, Maximum Achievable Control Technology) See Section V for review.

## V. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

Listed below is a summary of the NSPS permit evaluation from the Permit 04090T28 review for the Step 1 significant modification for new Boiler No. 7.

**NSPS** – Because Boiler No.7 **(ID No. ES-025)** is constructed after June 19, 1984 and its heat input is greater than 100 million Btu per hour, it is subject to NSPS Subpart Db. The boiler is subject to the following NSPS Subpart Db regulations:

- 40 CFR 60.52b, SO2 limit – The facility will only use ultra-low sulfur diesel (ULSD) with $SO_2$ concentration at 15ppm (0.0015 pounds per million Btu). Per 40 CFR 60.42b(k)(1), because the $SO_2$ emission rate is well below the limit of 0.32 pounds per million Btu, this boiler is not subject to the $SO_2$ emission limit. The facility is required to keep receipts of the ULSD at that facility to demonstrate compliance.
- 40CFR 60.43b, Visible emission limit – The boiler is subject to this opacity standard, which is more stringent than the state regulation, 15A NCAC 02D .0521. The opacity requirements will be added to the permit.
- 40 CFR 60.43b, PM limit – Because the facility will be using only ULSD, the boiler is expected to meet the standard per 40CFR 60.43b(h)(1). As long as the facility keep records of receipts of USLD, compliance is expected.
- 40 CFR 60.44b, NOx limit – Per §60.44b(l)(1), the boiler shall limit its NOx emissions to 0.2 pounds per million Btu. This limit will be added to the permit.
- 40 CFR 60.46b, initial performance test requirements – the boiler is subject to the initial performance test requirements for NOx and opacity. Per §60.8, these tests shall be conducted 60 days after achieving the maximum production rate at which each affected boiler will be operated, but not later than 180 days after initial startup of the boiler. Test requirements are added to the permit. Test requirements were added to the permit.

- 40 CFR 60.46b(a), Continuous opacity monitoring system (COM) – Per §60.48b(j)(2), COM is not required as long as the facility uses No.2 fuel oil which has less potential $SO_2$ emissions than the limit of 0.060 pounds per million Btu.
- 40 CFR 60.46b and 60.48b, NOx monitoring system - The facility shall install a continuous emission monitoring system (CEMS) to ensure compliance with the NOx limit. Alternatively, the facility may use a predictive emissions monitoring system (PEMS) instead of installing a CEMS per §60.48b(g)(2). Because the facility has not decided which monitoring system they are using, both conditions were added to the permit to allow flexibility and give them the ability to choose when they install the boiler.
- 40 CFR 60.48b, Method 9 performance test will be performed initially and the facility shall conduct subsequent performance Method 9 test as required by NSPS Subpart Db.
- 40 CFR 60.7(c), NOx reporting requirements, were updated from semiannual to quarterly for monitoring and recordkeeping activities given in Permit Section 2.1 C.4.h through k located in Section 2.1 C.4.m.

**NESHAPS/MACT** – The facility is classified as a Title III minor facility; as such it is subject to the area source GACTs promulgated under 40 CFR 63. Boiler No. 4 (ID No. ES-20) and Boiler No. 6 (ID No. ES-22) are subject to NESHAP Subpart JJJJJJ. Boiler No.7 (ID No. ES-025) will be classified as a "gas fired-boiler" because No.2 fuel oil will be used only during periods of gas curtailment. Therefore, this boiler is exempt from the Subpart JJJJJJ requirements per §63.11195(e). To ensure this boiler meets the definition of "gas fired-boiler," monitoring, recordkeeping and recording requirements will be added to the permit as avoidance conditions.

**PSD** – The facility is currently classified as PSD major as they are subject to multiple PSD Avoidance conditions for their existing boilers **(ID Nos. ES-020 and ES-022)**. The following table indicates the current requirements:

| Emission Source(s) | Regulated Pollutant | Limits/Standards |
|---|---|---|
| **ES-020** | Sulfur dioxide | Less than 250 tons per 12-month rolling period |
| **ES-020** | Nitrogen oxides | Less than 250 tons per 12-month rolling period |
| **ES-025** | Nitrogen oxides | Less than 40 tons per 12-month rolling period combined |

Based on this application, the potential emissions from new Boiler No.7 were calculated based on the following conditions:

- Maximum heat input of 182 pounds per million Btu.
- Sulfur content of No.2 fuel oil is 0.0015 weight % (15ppmw)
- No.2 fuel oil usage will be limited to 1,000 hours
- Natural gas usage will be limited to 7,750 hours

| | Potential emissions w/o limitations | | Potential emission with limitations | | | |
|---|---|---|---|---|---|---|
| Pollutant | No.2 fuel oil | Natural gas | No.2 fuel oil | Natural gas | Total | PSD level |
| | Tons/yr | Tons/yr | Tons/yr | Tons/yr | Tons/yr | Tons/yr |
| PM10 | 13.10 | 5.98 | 1.5 | 5.26 | 6.76 | 15 |
| PM2.5 | 8.83 | 5.98 | 1.01 | 5.26 | 6.27 | 10 |
| SO2 | 1.20 | 0.48 | 0.14 | 0.42 | 0.56 | 40 |

| | | | | | | |
|---|---|---|---|---|---|---|
| NOx | 97.37 | 31.89 | 11.10 | 28.75 | 39.35 | 40 |
| CO | 58.93 | 65.37 | 6.73 | 58.15 | 64.88 | 100 |
| VOC | 1.14 | 4.30 | 0.13 | 3.81 | 3.94 | 40 |

* Vendor emission factors for NOx are 0.04 lbs/ million Btu for natural gas and 0.12 lbs/ million Btu for No. 2 fuel oil. Emission factors for CO are from vendor data and the rest of emission factors are from AP-42.

In order to stay under PSD significance level of 40 tons/yr for NOx, the facility proposes to use a NOx formula that utilizes natural gas and fuel oil combustion per Permit Section 2.1 C.5.d.

$$m_{NOx} = 41(Q_{NG}) + 17(Q_{No.2})$$

Where: $m_{NOx}$ = NOx emissions (pounds)
$Q_{NG}$ = natural gas burned (1,000,000 cubic feet)
$Q_{No.2}$ = No. 2 fuel oil burned (1,000 gallons)

With the formula as shown above, potential NOx emissions will stay under 40 tons per year. Boiler No. 7 is capable of utilizing natural gas 8,760 hours per year.

The $SO_2$ and NOx PSD avoidance conditions for Boiler No. 5 (ID No. ES-21) and Boiler No. 6 (ID No. ES-22) were removed. No. 5 boiler was replaced by No. 7 Boiler. No. 6 Boiler will not use No. 6 or No. 2 fuel oil anytime in the future and removed the fuels from the permit. No. 6 Boiler is only permitted to utilize natural gas. Thus the No. 6 Boiler emission rate for $SO_2$ and NOx are well below the PSD thresholds.

**112(r)** – The Permittee is currently subject to Section 112(r) of the Clean Air Act and is required to comply with all applicable requirements in accordance with 40 CFR Part 68. No change in this regulation was made.

**CAM** – Because Boiler No. 7 does not have a control device, CAM is not applicable.

## VI. Facility Wide Air Toxics

Below is a summary of the toxics permit evaluation from the Permit 04090T28 review for the Step 1 significant modification for new Boiler No. 7.

The facility previously had a formaldehyde emission limit under the toxic emissions regulations. The limit was removed during the last renewal because the facility is subject to GACT Subpart JJJJJJ and Subpart ZZZZ. Because the addition of the new boiler would increase potential formaldehyde emissions, toxic pollutants emissions were evaluated to ensure that they do not present a health risk.

According to Mr. David Keen of RTP Environment, the only sources of formaldehyde emissions are the boilers, and all the boilers are equipped with vertical stacks with no obstruction. Per 02Q .1100 (b), TPER for facility-wide formaldehyde emission for this facility is 0.16 lb/hr.

Based on the facility's 2015 emissions inventory, facility-wide formaldehyde emissions were 67.656 lbs/yr. Because the facility operates 24 hours/7 days a week, an hourly emission rate was calculated by dividing 67.565 lbs by 8760 hours, and the actual hourly emissions was 0.00772 lbs/hr. Based on DAQ's emissions calculation spreadsheet, potential formaldehyde emissions from the new boiler were calculated to be 0.062 lb/hr. Therefore, total formaldehyde emissions are 0.069 lb/hr, which is

well below the 0.16 lb/hr TPER limit. The new boiler is not expected to present an unacceptable health risk.

## VII. Facility Emissions Review

Actual emissions from 2014 through 2018 are listed on Page 1. Based on this application, the following table represents potential emissions after controls and limitations:

| Pollutant(s) | Potential Emissions (tpy) |
|---|---|
| CO | 142 |
| $NO_x$ | 294 |
| $PM_{10}$ | 25 |
| PM2.5 | 20 |
| $SO_2$ | 2.2 |
| VOC | 8.2 |

## VIII. Stipulation Review

The facility was last inspected by Evangelyn Lowery-Jacobs of the Fayetteville Regional Office on January 15, 2020. At the time of the inspection, the facility appeared to be in compliance with all applicable air quality regulations.

## IX. Compliance Status

On March 29, 2019, February 5, 2020, a Notice of Deficiency (NOD) was issued by the FRO for not complying with certain requirements of 15A NCAC 02D .2100 Risk Management Program for 40 CFR 68 Accidental Release Prevention Requirements. A written response was received by the FRO and no further action is needed as a result of the NOD.

The facility was last inspected by Evangelyn Lowery-Jacobs of the Fayetteville Regional Office on January 15, 2020. At the time of the inspection, the facility appeared to be in compliance with all applicable air quality regulations.

On February 5, 2020, a Notice of Deficiency (NOD) was issued by the FRO for not submitting a notice of performance testing 30 days prior to the source testing. The facility did not submit a performance test results within 180 days after initial startup of Boiler No. 7. A written response was received by the FRO and no further action is needed as a result of the NOD.

On May 5, 2020, a Notice of Violation was issued for not complying with the quarterly cylinder gas audit on the NOx/O2 CEMs installed on Boiler No. 7 during the fourth quarter of 2019. Therefore, the facility is in violation of 15A NCAC 02D .0524 NSPS as promulgated in 40 CFR Part 60, Appendix F. The violation and communications are still in process.

There have been no other compliance issues within the past five years.

## X. Public Notice/EPA and Affected State(s) Review

A thirty-day public notice period and a forty-five-day EPA review period is required for this step 2 significant modification of the Title V permit. A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an

opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to the EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above

EPA's 45 Day Review period

Kelly Fortin (U.S. EPA, Region IV) was provided a PROPOSED permit for review on August ##, 2020. EPA 45-day review period ended on October ##, 2020. No comments were offered or received.

Public Notice

The 30-day public notice of the PROPOSED permit was posted on the NCDAQ website on August ##, 2020. No comments were offered or received.

## XI. Other Regulatory Considerations

- A P.E. seal was not required for the permit modification.
- The appropriate number of application copies was received by the DAQ.
- A zoning consistency determination was received by Dixon Ivey, Robeson County Zoning Administration, March 5, 2020.
- An application fee of $988 was required and received by check for the permit modification.
- In Robeson County, PM10 and SO2 are triggered for PSD minor baseline dates. For the Step 1 modification, the incremental PSD baseline emissions are calculated as follows:
  PM10: 6.76 tpy/8760 hrs/yr *2000 lbs/ton = 1.54 lbs/hr
  SO2: 0.56 tpy/8760 hrs/yr*2000 lbs/ton = 0.13 lbs/hr
- Any increment changes associated with this Step 2 modification were addressed in the Step 1 permit applications (No. 7800159.17A and 7800159.17B).

## XII. Conclusions, Comments, and Recommendations

The permit modification application (7800159.20A) for Campbell Soup Supply Company located in Maxton, Robeson County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 04090T31.